

UNITED STATES DISTRICT COURT  
FOR NORTHERN DISTRICT OF ILLINOIS

E.I. DU PONT DE NEMOURS AND  
COMPANY,

Plaintiff/Judgment Creditor,

v.

Case No. 12 Civ 5529

KOLON INDUSTRIES, INC. A/K/A KOLON  
CORPORATION,

Defendant/Judgment Debtor,

API-KOLON ENGINEERED PLASTICS A/K/A  
ADVANCE PLASTICS, INC.,

Garnishee.

**NOTICE OF MOTION**

To: See Certificate of Service

PLEASE TAKE NOTICE THAT on **November 20, 2012** at **8:30 a.m. or as soon thereafter as we may be heard**, we shall appear before the Honorable Judge Lefkow, in courtroom 1925 of the United States District Court for the Northern District of Illinois, 219 South Dearborn Street, Chicago, Illinois, and present Debtor's **Motion for Judgment**, a copy of which is served upon you herewith.

*/s/ Bryan K. Duplechain*

Bryan K. Duplechain, IL Bar No. #6284499  
333 West Wacker Drive, Suite 500  
Chicago, IL 60606  
[bdup@sanchezdh.com](mailto:bdup@sanchezdh.com)

**CERTIFICATE OF SERVICE**

The undersigned attorney certifies that copies of this **Motion to Judgment** was served upon the below persons via regular mail, postage prepaid and properly addressed, in addition to those parties receiving notification by participation in the Court's ECF system on the 15th day of November, 2012:

*/s/ Bryan K. Duplechain*

Bryan K. Duplechain, IL Bar No. #6284499  
333 West Wacker Drive, Suite 500

Chicago, IL 60606

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API-KOLON ENGINEERED PLASTICS A/K/A  
ADVANCE PLASTICS, INC.,

Garnishee.

**MOTION FOR JUDGMENT AND ORDER**

1. Plaintiff/Judgment Creditor has a judgment unsatisfied against the Defendant/Judgment Debtor in this court.

2. As of November 5, 2012, the amount due to the Plaintiff/Judgment Creditor from the Defendant/Judgment Debtor as a result of the judgment is US \$ \$918,727,985.96, inclusive of applicable interest accrued to date.

3. Plaintiff/Judgment Creditor had reason to believe, and did believe, that Garnishee API-KOLON ENGINEERED PLASTICS A/K/A ADVANCE PLASTICS, INC., was indebted to the Defendant in amounts exceeding those exempted from garnishment by any state or federal law, or had possession or control of personal property or effects belonging to the Defendant which are not exempted from garnishment by any state or federal law. Accordingly, on October 10, 2012, Plaintiff/Judgment Creditor served the Garnishee with the Writ of Garnishment issued by this Court on August 8, 2012.

4. On Novembre 12, 2012, Garnishee served an Answer to Interrogatories to the Plaintiff/Judgment Creditor, stating that there was due and owing from Garnishee to the Defendant/Judgment Debtor a sum of \$158,403.30 at the time the Writ of Garnishment was served on the Garnishee.

5. Accordingly, Garnishee currently owes the Defendant/Judgment Debtor an undisputed sum of \$158,403.30.

WHEREFORE, the Plaintiff/Judgment Creditor E.I. du Pont de Nemours and Company respectfully requests this Court to issue the attached Judgment and Order for the turnover of \$\$158,403.30.

Dated: Chicago, Illinois  
November 15, 2012

SANCHEZ DANIELS & HOFFMAN LLP

/s/ Bryan K. Duplechain  
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333 West Wacker Drive, Suite 500  
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(312) 641-1555